

Our File No. TAR-060-CM

Fishman McIntyre P.C.

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UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

SANDRA GEISS AND ROBERT GEISS :

h/w :

Plaintiffs, :

-vs- :

CIVIL ACTION 09-2208(RBK)

TARGET CORPORATION, and/or  
TARGET CORPORATION OF  
MINNESOTA, JOHN DOES 1-5  
(fictitious persons), and ABD CORPS 1-5  
(fictitious corporations),

Defendants.

**PETITION FOR REMOVAL**

Petitioner, Target Corporation by its attorneys, Fishman McIntyre P.C., respectfully petitions the United States District Court for the District of New Jersey as follows:

1. Target Corporation first received the Complaint on April 9, 2009.
2. This case was commenced on March 30, 2009 in the Superior Court of New Jersey, Law Division, Burlington County. Suit is identified in the Superior Court as Sandra Geiss and Robert Geiss, h/w v. Target Corporation, Docket No. BUR-L-1057-09 (Exhibit A).
3. The filing of this Petition for Removal is timely because it is filed within thirty days of the date Target Corporation first received notice of the lawsuit.
4. The plaintiff's Complaint in the Superior Court of New Jersey, Law Division,

Burlington County, asserts damages of a non-specified amount. Plaintiff claims that as a result of the incident in question, she was caused to fall and suffer severe and permanent injuries to various parts of her body, including the nervous system and was and will in the future be compelled to expend great sums of money for medical aid and attention in an effort to cure herself. As such, defendant, Target Corporation, believes that the amount in controversy exceeds \$75,000, exclusive of interest and costs.

5. Target Corporation is informed and believes that plaintiff, Sandra Geiss is an individual citizen of the State of New Jersey. Defendant/Petitioner, Target Corporation, is incorporated in the State of Minnesota and has its principal place of business in the State of Minnesota. The action is therefore between citizens of the State of New Jersey and a corporation of other states.

6. Accordingly, this action is removable to this Court pursuant to 28 U.S.C. § 1441.

WHEREFORE, Petitioner, Target Corporation, defendant in the action described herein, which is currently pending in the Superior Court of the State of New Jersey, Law Division, Burlington County, Docket No. BUR-L-1057-09, prays that this action be removed therefrom to this Court.

DATED: May 7, 2009

FISHMAN MCINTYRE P.C.

Attorney for Defendant,  
Target Corporation

BY:

  
Christopher E. McIntyre, Esq.

I certify that a true copy of the Complaint filed in the Superior Court of the State of New Jersey, County of Ocean, along with a copy of the Summons issued to this defendant, is annexed hereto as Exhibit A.

BY:

  
Christopher E. McIntyre, Esq.